

The Honorable Barbara J. Rothstein

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

CHERYL BAIR, an individual,

Plaintiff,

vs.

SNOHOMISH COUNTY, et al.,

Defendants.

NO. C19-998-BJR

JOINT STIPULATED MOTION AND  
ORDER REGARDING ADDITIONAL  
PRETRIAL DEADLINES

COMES NOW Defendants Snohomish County, Olyntia Sewell, Jodi Martin, Taylor Jones, Robert Ogawa, Scott Lewis, Scott Warnken, and Chicara Chesney, by and through their counsel of record, Deputy Prosecuting Attorneys Katherine H. Bosch and Bridget E. Casey; and Defendant Hamadi Sisawo, by and through his counsel of record, Jennifer Smitrovich and Emory Wogenstahl; and Plaintiff, by and through her counsel of record, Darryl Parker; and in addition to those dates previously ordered in:

(1) Order Setting Trial Date & Related Dates (Dkt. #13);

(2) Order Granting Plaintiff's Motion to Modify Scheduling Order (Dkt. #19);

(3) This Court's Minute Order dated March 16, 2020 (Dkt. #35);

(4) Judge Rothstein's Standing Order for Civil Cases (dated and signed October 6, 2016);  
and

(5) The Federal Rules of Civil Procedure,  
the parties hereby stipulate and mutually agree to the following additional pretrial deadlines:

Deadline for FILING motions related to discovery: **August 26, 2020**  
(see LCR 7(d)(3) re. filing and noting dates)  
See Judge Rothstein's Standing Orders, ¶ III (pg. 3) prior to filing these motions.

All Dispositive Motions Must be FILED by: **September 28, 2020**  
(see LCR 7(d) for filing requirements)

Deadline for Mediation/Settlement Conference per CR 39.1(c)(2): **October 26, 2020**  
(voluntary per LCR 39.1(a)(4), unless ordered by the Court, per LCR 39.1(a)(4); see also CR 39.1(c)(3))

Plaintiff's Proposed Pretrial Statement to Defendants by: **December 28, 2020**  
(per LCR 16(h))

Defendants' Proposed Pretrial Statement to Plaintiff by: **January 6, 2021**  
(per LCR 16(i))

Deadline to Meet and Confer re. Completing Joint Pretrial Statement: **January 15, 2021**  
(per LCR 16(k))

Deadline for all Motions in Limine to be NOTED by (file with the court and all parties no later than January 21, 2021): **February 5, 2021**  
(see Fed. CR 7(d)(4) for specific instructions)

Proposed Joint Voir Dire, Proposed Joint Jury Instructions, and Verdict Forms due: **January 25, 2021**  
See Judge Rothstein's Standing Orders, ¶ VIII(D) (pg. 8) for specific instructions on this issue.

Original (in a Notebook) and Three (3) Bound Copies of Trial Exhibits due to the Court: **February 22, 2021**  
NOTE: See Judge Rothstein's Standing Orders, ¶ VIII(B) (pg. 6) for specific instructions on this issue.

Original and Three (3) Copies of Each Party's Witness & Exhibit Lists due to the Court: **February 22, 2021**  
NOTE: See Judge Rothstein's Standing Orders, ¶ VIII(B) (pg. 6) for specific instructions on this issue.

1 DATED this 10<sup>th</sup> day of April 2020.

2 FAIN ANDERSON VanDERHOEF  
3 ROSENDAHL O'HALLORAN  
4 SPILLANE, PLLC

5 By: /s/ Emory C. Wogenstahl  
6 JENNIFER SMITROVICH, WSBA  
7 #37062  
8 EMORY C. WOGENSTAHL, WSBA  
9 #53864  
10 *Attorneys for Defendant Hamadi Sisawo*

11 DATED this 10<sup>th</sup> day of April, 2020.

12 CIVIL RIGHTS JUSTICE CENTER, PLLC

13  
14 By: /s/ Darryl Parker  
15 DARRYL PARKER, WSBA #30770  
16 *Attorney for Plaintiff Virgil Armstrong*

DATED this 10<sup>th</sup> day of April 2020.

ADAM CORNELL  
Snohomish County Prosecuting Attorney

By: /s/ Katherine Bosch  
BRIDGET CASEY, WSBA # 30459  
KATHERINE BOSCH, WSBA #43122  
Deputy Prosecuting Attorney  
*Attorney for Defendants Snohomish County,  
Olyntia Sewell, Jodi Martin, Taylor Jones,  
Robert Ogawa, Scott Lewis, Scott Warnken,  
and Chicara Chesney*

**ORDER**

IT IS SO ORDERED that the parties' Joint Stipulated Motion Regarding Additional Pretrial Deadlines is APPROVED and GRANTED. In addition to the dates previously ordered by this Court (Dkt. #13; Dkt. #19; Dkt. #35), the parties shall comply with the additional dates set forth above.

DATED this 14th day of April, 2020.



HONORABLE BARBARA J. ROTHSTEIN  
United States District Court Judge

**DECLARATION OF SERVICE**

I declare that I am an employee of the Civil Division of the Snohomish County Prosecuting Attorney, and that on the 13<sup>th</sup> day of April, 2020, I caused to be delivered foregoing document on the following party by the methods indicated:

Darryl Parker, WSBA #30770  
Civil Rights Justice Center, PLLC  
2150 N. 107<sup>th</sup> Street, Suite 520  
Seattle, WA 98133  
*Attorney for Plaintiff Cheryl Bair*

☒ ***E-filed via CM/ECF***  
☐ Facsimile:  
☐ Express Mail  
☐ Emailed  
☐ U.S. Mail  
☐ Hand Delivery  
☐ Messenger Service

Jennifer M. Smitrovich  
Emory C. Wogenstahl  
Fain Anderson VanDerhoef, Rosendahl  
O'Halloran Spillane, PLLC  
701 Fifth Avenue, Suite 4750  
Seattle, WA 98104  
*Attorneys for Defendant Hamadi Sisawo*

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☐ U.S. Mail  
☐ Hand Delivery  
☐ Messenger Service

I certify under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

DATED this 13<sup>th</sup> day of April, 2020.

\_\_\_\_\_  
Cindy Ryden, Legal Assistant